

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:
KRISJENN RANCH, LLC
Debtor

§§§§

Chapter 11

Case No. 20-50805

**KRISJENN RANCH, LLC and
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE
ROW as successors in interest to
BLACKDUCK PROPERTIES, LLC,
*Plaintiffs***

§ 100.00

V.

**DMA PROPERTIES, INC., and
LONGBRANCH ENERGY, LP,
*Defendants***

§§§

Adversary No. 20-05027

DMA PROPERTIES, INC
Cross-Plaintiff/Third Party Plaintiff

§§

V.

**KRISJENN RANCH, LLC,
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE ROW,
BLACK DUCK PROPERTIES, LLC,
LARRY WRIGHT, and JOHN TERRILL**
*Cross-Defendants/Third-Party
Defendants*

Adversary No. 20-05027

**KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH, AND
KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS SUCCESSORS IN INTEREST
TO BLACK DUCK PROPERTIES, LLC, AND LARRY WRIGHT'S
EXHIBIT AND WITNESS LIST**

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively

the “Debtors”), and Larry Wright, individually, and submit the following list of exhibits to be offered and witnesses who may or will be called to testify at the January 11, 2021, trial on the merits:

| EXHIBIT NO. | DESCRIPTION OF EXHIBIT | OFFERED | ACCEPTED | REJECTED |
|--------------------|--|----------------|-----------------|-----------------|
| 1 | Email August 5, 2016 with attached Memo July 14, 2010 | | | |
| 2 | Email FW on January 10, 2019 referring to Email July 20, 2014 | | | |
| 3 | Email December 2, 2015 Subject: Business Formation | | | |
| 4 | Email FW on January 10, 2019 referring to Email February 5, 2016 | | | |
| 5 | Black Duck Company Agreement | | | |
| 6 | Email February 19, 2016 | | | |
| 7 | Email May 13, 2016 through June 3, 2016 | | | |
| 8 | Email March 31, 2016 | | | |
| 9 | Email April 17, 2016 | | | |
| 10 | Email May 13, 2016 | | | |
| 11 | Email June 8, 2016 | | | |

| | | | | |
|----|--|--|--|--|
| 12 | Email June 8, 2016 through June 9, 2016 | | | |
| 13 | Agreement for Assignment | | | |
| 14 | Email July 15, 2016 | | | |
| 15 | Email September 20, 2016 | | | |
| 16 | Email September 28, 2016 | | | |
| 17 | Email October 13, 2016 | | | |
| 18 | Email November 8, 2016 | | | |
| 19 | Receipt of Payment | | | |
| 20 | Email February 21, 2017 | | | |
| 21 | Email February 21, 2017 | | | |
| 22 | Email March 2, 2017 | | | |
| 23 | Promissory Note | | | |
| 24 | Email FW on January 10, 2019 referring to Email April 25, 2017 | | | |
| 25 | Email April 8, 2017 | | | |

| | | | | |
|----|--|--|--|--|
| 26 | Email April 17, 2017 | | | |
| 27 | Email April 24, 2017 | | | |
| 28 | Email FW on January 10, 2019 referring to Email May 25, 2017 | | | |
| 29 | Email May 31, 2017 | | | |
| 30 | Email FW on January 10, 2019 referring to Email June 30, 2017 | | | |
| 31 | Consent of Members July 13, 2017 | | | |
| 32 | Extension of Closing Date July 14, 2017 | | | |
| 33 | Email July 17, 2017 | | | |
| 34 | Email August 3, 2017 | | | |
| 35 | Email October 9, 2017 | | | |
| 36 | Deed, Conveyance and Assignment August 11, 2017 | | | |
| 37 | Real Estate Lien Note Asilo August 14, 2017 | | | |
| 38 | Real Estate Lien Notes August 14, 2017 | | | |
| 39 | Email April 9, 2018 with attachment Recorded Longbranch Assignment dated October 2, 2017 | | | |

| | | | | |
|----|---|--|--|--|
| 40 | Email January 9, 2018 | | | |
| 41 | **** Electronically Filed Document**** Deed of Trust for Loan to KrisJenn | | | |
| 42 | Email FW on January 10, 2019 referring to Email January 17, 2018 | | | |
| 43 | Email January 31, 2018 | | | |
| 44 | Email February 1, 2018 | | | |
| 45 | Email FW on January 10, 2019 referring to Email February 2, 2018 | | | |
| 46 | Email February 2, 2018 | | | |
| 47 | Email February 3, 2018 | | | |
| 48 | Email February 3, 2018 | | | |
| 49 | Email February 3, 2018 | | | |
| 50 | Email February 5, 2018 | | | |
| 51 | 00193765 VOL: 3610 PG:414 Agreement | | | |
| 52 | Email February 7, 2018 | | | |
| 53 | Email February 7, 2018 | | | |

| | | | | |
|----|--|--|--|--|
| 54 | Email February 8, 2018 through April 9, 2018 | | | |
| 55 | Email FW on December 4, 2020 referring to Email February 8-9, 2018 | | | |
| 56 | TCRG Company Agreement | | | |
| 57 | Email February 20, 2018 | | | |
| 58 | Harris SWD Agreement | | | |
| 59 | Email March 20, 2018 | | | |
| 60 | Assignment and Resignation Agreement | | | |
| 61 | Deed, Conveyance, Assignment and Bill of Sale | | | |
| 62 | Email FW on January 10, 2019 referring to Email April 9-11, 2018 | | | |
| 63 | Email April 9, 2018 with Attachment | | | |
| 64 | Email April 9, 2018 with Attachment | | | |
| 65 | Email April 9, 2018 with Attachment | | | |
| 66 | Email April 9-11, 2018 | | | |
| 67 | Email April 10, 2018 | | | |

| | | | | |
|----|--|--|--|--|
| 68 | Email April 10 through July 24, 2018 | | | |
| 69 | Email April 11, 2018 | | | |
| 70 | Email FW on December 7, 2020 referring to Email April 10 through July 24, 2018 | | | |
| 71 | Instrument Number: 2018-4273 | | | |
| 72 | Guaranty of Debt | | | |
| 73 | Notice of Default | | | |
| 74 | Letter October 12, 2018 | | | |
| 75 | Email November 7, 2018 | | | |
| 76 | Email December 19, 2018 | | | |
| 77 | Letter December 21, 2018 | | | |
| 78 | Email FW on December 7, 2020 referring to Email July 24, 2018 | | | |
| 79 | Intentionally left blank. | | | |
| 80 | Email FW on December 7, 2020 referring to Emails December 19, 2018 and April 4, 2019 | | | |
| 81 | Email January 31, 2019 | | | |

| | | | | |
|----|---|--|--|--|
| 82 | Email February 1, 2019 | | | |
| 83 | Term Note | | | |
| 84 | Loan Agreement | | | |
| 85 | Release of Lien | | | |
| 86 | Email February 19, 2019 | | | |
| 87 | Letter February 26, 2019 | | | |
| 88 | Letter March 5, 2019 | | | |
| 89 | Email FW on December 7, 2020 referring to Email April 3, 2019 | | | |
| 90 | Email April 5, 2019 | | | |
| 91 | Email April 13, 2019 | | | |
| 92 | Email April 16, 2019 | | | |
| 93 | Email April 23, 2019 | | | |
| 94 | Email May 3, 2019 | | | |
| 95 | Email May 21, 2019 | | | |

| | | | | |
|-----|--|--|--|--|
| 96 | Email May 31, 2019 | | | |
| 97 | Compromise Settlement Agreement | | | |
| 98 | Johns&Counsel Supplement to Engagement Agreement and Contract for Contingent Fee | | | |
| 99 | Email September 16, 2020 | | | |
| 100 | Text messages produced by Longbranch Energy, LP, | | | |
| 101 | Text messages produced by Longbranch Energy, LP, | | | |
| 102 | Tax Forfeiture January 29, 2016 | | | |
| 103 | Email February 20, 2018 | | | |
| 104 | December 19, 2018 Certificate of Termination. | | | |

Debtors and Wright reserve the right to request admission of exhibits designated by any other party.

Witnesses who may be called to testify are as follows:

1. Larry Wright
c/o William Germany
BAYNE, SNELL & KRAUSE
1250 N.E. Loop 410, Suite 725
San Antonio, TX 78209
wgermany@bsklaw.com

2. Frank Daniel Moore
c/o Timothy Cleveland
Austin Krist
Cleveland | Terrazas PLLC
303 Camp Craft Road, Suite 325
Austin, Texas 78746
(512) 689-8698
tcleveland@clevelandterrazas.com
akrist@clevelandterrazas.com
3. Darin Borders
c/o Timothy Cleveland
Austin Krist
Cleveland | Terrazas PLLC
303 Camp Craft Road, Suite 325
Austin, Texas 78746
(512) 689-8698
tcleveland@clevelandterrazas.com
akrist@clevelandterrazas.com
4. Hagan Cohle
c/o William Germany
BAYNE, SNELL & KRAUSE
1250 N.E. Loop 410, Suite 725
San Antonio, TX 78209
wgermany@bsklaw.com
5. Craig Crockett
2509 Merrick Street
Fort Worth, Texas 76107
(817) 626-9898
Craig@TCRG.com
6. David Strolle
(210) 348-6600
Dstrolle@caglaw.net
7. John Terrill
12712 Arrowhead Lane
Oklahoma City, OK 73120
8. Adam McCleod
c/o William D. Kuhlmann, Jr.
ALBERT, NEELY & KUHLMANN, L.L.P.
1600 Oil and Gas Building
309 West Seventh Street

Fort Worth, Texas 76102

Debtors and Wright reserve the right to call rebuttal witnesses and any witness designated by another party.

Dated: January 8, 2021.

Respectfully submitted,

MULLER SMEBERG, PLLC

By: /s/ John Muller

C. John Muller IV

State Bar No. 24070306

john@muller-smeberg.com

Ezekiel J. Perez

State Bar No. 24096782

zeke@muller-smeberg.com

111 W. Sunset Rd.

San Antonio, TX 78209

Telephone: 210-664-5000

Facsimile: 210-598-7357

ATTORNEYS FOR DEBTORS

BAYNE, SNELL & KRAUSE

1250 N.E. Loop 410, Suite 725

San Antonio, Texas 78209

Telephone: (210) 824-3278

Facsimile: (210) 824-3937

Email: wgermany@bsklaw.com

By: /s/ William P. Germany

WILLIAM P. GERMANY

State Bar No. 24069777

ATTORNEY FOR THIRD-PARTY

DEFENDANT LARRY WRIGHT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 8th day of January 2021:

Michael Black
BURNS & BLACK PLLC
750 Rittiman Road
San Antonio, Texas 78209
210-829-2022
210-829-2021 fax
mblack@burnsandblack.com
Attorneys for Longbranch Energy, LP
and DMA Properties, Inc.

Christopher S. Johns
Christen Mason Hebert
JOHNS & COUNSEL PLLC
14101 Highway 290 West, Suite
400A
Austin, Texas 78737
512-399-3150
512-572-8005 fax
cjohns@johnsandcounsel.com
chebert@johnsandcounsel.com

Timothy Cleveland
CLEVELAND | TERRAZAS PLLC
4611 Bee Cave Road, Suite 306B
Austin, Texas 78746
512-689-8698
tcleveland@clevelandterrazas.com
Attorneys for DMA Properties, Inc.

Natalie Wilson
LANGLEY & BANACK, INC.
745 East Mulberry Avenue | Suite 700
San Antonio, TX 78212
210-736-6600
lwilson@langleybanack.com
Attorneys for DMA Properties, Inc.

Jeffery Duke
DUKE BANISTER MILLER & MILLER
22310 Grand Corner Drive, Suite 110
Katy, Texas 77494
jduke@dbmmlaw.com
Counsel for Longbranch Energy, LP

William Germany
BAYNE, SNELL, & KRAUSE
1250 NE Loop 410, Ste. 725
San Antonio, Texas 78209
T- (210) 824-3278
F- (210) 824-3937
wgermany@bskaw.net
Attorney for Larry Wright

OFFICE OF THE UNITED STATES
TRUSTEE
903 San Jacinto Blvd, Room 230
Austin, Texas 78701
shane.p.tobin@usdoj.gov
United States Trustee

/s/ John Muller

C. John Muller IV

\